

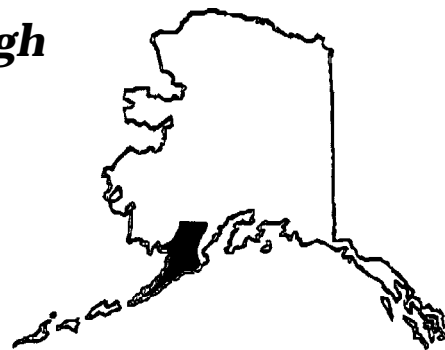


April 10, 2000

Lake and Peninsula Borough

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Mr Eric Taylor
Area Plans Coordinator
ADOT/PF
3132 Channel Dr.
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SUBJECT: Airport Improvement Analysis Technical Memorandum

Dear Mr. Taylor:

It was a pleasure to see you in Dillingham last week. Thanks for taking the time to provide SWAMC participants with an overview of the Southwest Alaska Transportation Plan. The Borough appreciated the review but was somewhat disappointed that there was not more time allocated for discussing the document referenced above. This letter contains the Lake and Peninsula Borough's specific comments on the recently circulated Airport Improvement Analysis Technical Memorandum.

The Memorandum was reviewed by staff members, a consultant with transportation expertise, and the Borough Planning Commission. In general, the Borough is disappointed with this effort and feels that it falls short of the level of comprehensive analysis that is desirable and expected for a plan as important as this one. The Borough believes that the analysis is based upon insufficient and inaccurate data, that some of the assumptions used are invalid, and that the model employed for this analysis may not be appropriate. Our specific comments follow:

1. Cargo Statistics: The Borough believes that the report relies on data that are inaccurate and that it seriously underestimates the amount of cargo that is currently being flown into Peninsula communities. The Planning Commission concluded that the Total Weekly Demand presented in Table 3 is low for all communities. It appears that the consultants have not accounted for all of the independent charter operators and that they have seriously underestimated the amount of fuel that is being flown in; particularly in the villages around Lake Iliamna. One community provided the Borough with documented evidence that the amount of air cargo brought in by the Village Council alone was over twice the amount listed in the report for the entire

community. This does not include the high volume of private activity generated by the eight lodges that are within several miles of the community- The Borough questions the validity of a planning analysis that relies on such questionable data.

2. The Model: The Borough questions whether the model used for the Yukon-Kuskokwim Delta Transportation Plan is appropriate for an analysis of Southwest Alaska. There is far more economic activity in Southwest Alaska and the potential for economic growth is much greater. A greater percentage of the cargo carried by air is commercial in nature and the tourism trade is expanding rapidly. Further, the reasons given for not imputing fish value (Footnote 5, bottom of page 5) are difficult to understand. The model used in SW Alaska should include additional indicators of economic and business activity and the potential for growth.
3. Future Demand Analysis: The methodology employed to determine future demand is too limited in scope. As noted above, it does not adequately take into consideration existing economic activity and the potential for growth. The analysis appears to rely too heavily upon existing air traffic data and what is happening today. Some communities have far more potential for growth than others. The researchers should take this into account and tap into a broader range of socioeconomic and demographic data. They should also consider the economic development and capital improvement plans that have been adopted by local governments.
4. Infrastructure vs Market Forces: There appears to be an assumption within this analysis that current air traffic satisfies the current demand. The consultants seem to be saying that if a community does not have C-130s flying into it now, it probably does not need them This analysis relies too heavily on the perceived influence of market forces and ignores the influence of the infrastructure that is already in place. Many of our communities believe that their airport facilities are already placing limitations upon growth and economic activity. For example, our coastal fishing communities will have a hard time developing value-added fisheries and flying fresh fish to market if the airport is not capable of handling large cargo planes. The Lake Iliamna communities are now flying virtually all of their fuel in which is very expensive. Cargo planes cannot come in fully loaded with fuel because of the limitations imposed by runway length. In addition, short runway lengths make backhauling almost impossible. Increased runway length would reduce the cost of living, save a great deal of money, and stimulate economic activity. In short, it is difficult to project demand, design aircraft, and desired runway length if little consideration is given to what the demand might be if a larger facility existed.
5. Minimum Runway Length: The Borough believes that the minimum runway length for communities should be increased from 3,300 feet to 5,000 feet. This would allow for increased cargo capacity, reduce the cost of living, expand economic development opportunities, and allow for life-line emergency medical flights. The plan itself recognizes that increasing capacity is more economical than increasing the frequency Of flights. We recognize that increasing the minimum will result in additional maintenance costs for the State. Perhaps the State could incorporate a policy to increase the minimum in cases where the potential for increased economic activity justifies it and/or the local government is willing to contribute to maintenance costs for an expanded runway..

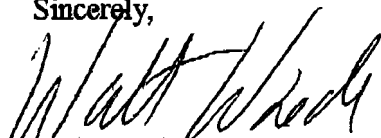
6. Port Heiden: The Borough believes that Port Heiden should be considered a Regional HUB airport. Port Heiden has direct scheduled air service from Anchorage. It is also a postal and freight hub for all of the communities in the southern part of the Borough.
7. Egegik: The airport in Egegik is not mentioned at all in the plan. We assume that this is because the City of Egegik now owns and operates it. However, Egegik is a major hub of economic activity in Bristol Bay. To exclude Egegik is to ignore the amount of air traffic that this airport generates. A regional transportation planning effort should take into consideration all facilities regardless of whether the State owns them or not.
8. Chignik: The Memorandum makes no mention of the fact that the three Chignik communities have identified the Mitrofanina Valley as the preferred site for a regional airport serving all communities. This document assumes that the regional airport needs will be served by expanding the existing City of Chignik airport. For this to work, the Chignik Inter-Village Road would have to be built to higher standards than are currently planned and it would have to be well maintained all year around.
9. Levelock: The Levelock airport is scheduled to be replaced in FY 2000 or 2001.

In summary, the Lake and Peninsula Borough believes that airports are and will continue to be the most important and dominant components of the transportation infrastructure in Southwest Alaska. According to the Introduction in this Memorandum, "the purpose of the Southwest Alaska Transportation Plan is to further an integrated regional transportation system." Airports are the most important mode in the transportation system. They deserve an analysis that is at least as thorough and comprehensive as the effort put into analyzing some of the road options that are obviously not feasible within the 20 year timeframe encompassed by this plan.

It is hard for us to believe that DOT/PF would support or defend the notion that there are no airports in Southwest Alaska, with the exception of Unalaska, that will need to be expanded within the next 20 years. The amount of change in air traffic in the Borough in the last 10 years alone is very impressive. Who would have guessed just five years ago that the small village of Igiugig would have direct, scheduled, several times a week air service to Anchorage with a 19 seat aircraft?

Thanks for the opportunity to comment. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,



Walt Wrede
Borough Manager